

LOG OF MEETING
DIRECTORATE FOR ENGINEERING SCIENCES

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Safety

SUBJECT: Meeting with AHAM on Alternative Refrigerant

DATE OF MEETING: May 24, 1995

LOG ENTRY SOURCE: Roy Deppa, ESME

COMMISSION ATTENDEES: Roy W. Deppa, ESME *[Signature]*

NON-COMMISSION ATTENDEES: Representatives of the Association of Home Appliance Manufacturers and a number of their member firms. Attendance varied during the meeting, and no attendance list was provided.

SUMMARY OF MEETING:

The focus of the meeting was educational; the member firms of AHAM requested the meeting to provide information to CPSC to solicit agency assistance in addressing a potential safety issue. The meeting had been planned as a regularly-scheduled meeting of the Rule 608 Task Force, but was opened for CPSC (and public) participation.

The meeting agenda was distributed the day prior to the meeting and is attached.

The discussion was very unstructured, but focused on the issues of flammable replacements for CFC refrigerants in consumer products. The requirements of the worldwide agreements to phase out CFCs has led to the possible future use of hydrocarbons as replacements, with potential hazardous conditions resulting.

The program for approval of alternatives resides at EPA under the SNAP (Significant New Alternatives Program). Some chemicals have been approved, and others may be in the approval process that could be of concern for consumer products. UL has a draft appendix for UL 250 for OEM equipment that is still in the review process. Each alternative must undergo a formal hazard assessment, and there is still some question as to what agencies will perform these assessments.

European refrigerators use hydrocarbons, but their designs are significantly different from those in the U.S. In Europe, the evaporator is located in a non-interior space such that a leak does not vent into the cabinet. There are some other differences that make the European (and some Asian) units fundamentally more compatible with the use of hydrocarbons than can be the case in the U.S.

- The "safety environments" of domestic refrigerators are:
1. plant/manufacturing OSHA
 2. transport DOT



- | | |
|-------------|------|
| 3. consumer | CPSC |
| 4. service | ? |
| 5. disposal | ? |

Studies on safety have been performed by German institutions, MITI, DuPont, and UL (for EPA). Most of the issues have been on energy to ignite, or cause an explosion.

There is a feeling in the AHAM membership that there is a "lack of ownership" by government agencies of the safety issues for consumers. They believe that EPA will look to the other agencies for support on the safety issues. They are frustrated by their inability to get to the EPA decision-making process on the matter of the safety issue, and are looking to CPSC for help in surfacing this matter. It is their belief that it is best if HCs are not added to the mix of refrigerants identified for use in consumer use.